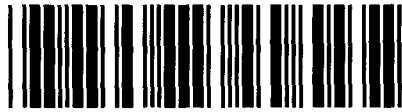




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PUC DOCKET NO. 48787

JOINT APPLICATION OF LCRA §
TRANSMISSION SERVICES §
CORPORATION AND AEP TEXAS INC. §
TO AMEND THEIR CERTIFICATES §
OF CONVENIENCE AND NECESSITY §
FOR THE PROPOSED BAKERSFIELD §
TO SOLSTICE 345-KV §
TRANSMISSION LINE IN PECOS §
COUNTY, TEXAS §

BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS

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**ONCOR ELECTRIC DELIVERY COMPANY LLC'S
MOTION TO INTERVENE**

Oncor Electric Delivery Company LLC ("Oncor") files this Motion to Intervene ("Motion") in the above-styled proceeding under 16 Tex. Admin. Code ("TAC") §§ 22.103 – 22.104. In support of this Motion, Oncor respectfully shows the following:

I. AUTHORIZED REPRESENTATIVES

The contact information for Oncor's authorized representative is as follows:

Chris Reily
Sr. Project Manager, Regulatory & External Affairs
1616 Woodall Rodgers Fwy.
Dallas, Texas 75202
Telephone: 214.486.4717
Facsimile: 214.486.3221
chris.reily@oncor.com

The contact information for Oncor's legal representatives is as follows:

Jaren A. Taylor
State Bar No. 24059069
Winston P. Skinner
State Bar No. 24079348
VINSON & ELKINS LLP
2001 Ross Avenue, Suite 3700
Dallas, Texas 75201
Telephone: 214.220.7700
Facsimile: 214.999.7716
jarentaylor@velaw.com
wskinner@velaw.com

Oncor requests that all documents in this proceeding be served upon its authorized and legal representatives.

II. ONCOR'S INTEREST

Pursuant to 16 TAC § 22.103(b), Oncor has standing to intervene in this proceeding because it has a justiciable interest which may be adversely affected by the outcome of the proceeding. This case involves the joint application of LCRA Transmission Services Corporation ("LCRA TSC") and AEP Texas Inc. ("AEP Texas") to amend their certificates of convenience and necessity ("CCN") in order to construct a proposed 345 kV transmission line located in Pecos County. As proposed by LCRA TSC and AEP Texas, the line will extend from LCRA's Bakersfield Station to AEP Texas' Solstice Switch Station.

Oncor is an electric transmission and distribution service provider across a substantial portion of West Texas. It owns and operates electric transmission assets throughout the state, including numerous stations and lines in and around LCRA TSC and AEP Texas' respective transmission facilities and service areas. Further, related to this proceeding, Oncor and AEP Texas have filed a joint application to amend their CCNs in Commission Docket No. 48785 in order to construct a new 345 kV transmission line from Oncor's Sand Lake Switch Station to AEP Texas' Solstice Switch Station. Oncor employee Mr. Brent R. Kawakami is providing testimony supporting the need for both of these projects. Under PURA § 37.0541, these two CCN proceedings may be consolidated since they share a common endpoint at AEP Texas' Solstice Switch Station. Consequently, Oncor's joint proposal with AEP Texas, as well as its other transmission facilities in the area, could be impacted by LCRA TSC and AEP Texas' proposal in this proceeding. For these reasons, Oncor has a direct, justiciable interest that could be adversely affected by the Commission's decision in this case, and no other party can adequately represent Oncor's interests.

III. CONCLUSION & PRAYER

WHEREFORE, PREMISES CONSIDERED, Oncor respectfully requests that this Motion be granted and that Oncor be granted party status in this proceeding.

Respectfully submitted,

By: 

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**ATTORNEYS FOR ONCOR ELECTRIC
DELIVERY COMPANY LLC**

CERTIFICATE OF SERVICE

Pursuant to 16 TAC § 22.74, I certify that on November 7, 2018, a true and correct copy of the foregoing document was served on all parties of record in this matter either in person; by agent; by courier receipted delivery; by first class mail; by certified mail, return receipt requested; by facsimile; or, if authorized, by email.

